REMARKS

In this response, new claims 77-85 have been added, and no claims have been canceled. Claims 10, 11, 16, 18-21, 68 and 75 have been previously canceled. Thus, independent claims 1, 76, 77, and 85 (and dependent claims 2-9, 12-15, 17, 22-67, 69-74, and 78-84) are now pending in this application. The Office Action issued by the Examiner has been carefully considered.

Claims 1-9, 12-15, 22-67, 69-74 and 76 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Jones et al. (hereinafter, "Jones", U.S. Patent No. 6,430,164) in view of Lu et al. (hereinafter, "Lu", U.S. Patent No. 5,734,699).

The Examiner has cited a new secondary reference, Lu, as allegedly showing a real-time interface processor (RTIP), and an application processor, wherein the RTIP performs real-time operations and the application processor performs high level processing functions. Lu is generally directed to a cellular phone system for facilitating communication with mobile station units. Communication is described as conforming to the GSM standard (see, e.g., col. 7, lines 6-10). As an example, the mobile station units transmit and receive data at 8 Kbps or 16 Kbps, which is carried by the phone system in a number of bearer data channels (col. 8, lines 55-63). Fig. 9 of Lu shows a transmission sub-system for processing inbound and outbound information for the mobile station units.

In particular, "TRX module 530 [of Fig. 9] represents a transceiver for processing outgoing data to MS units and incoming data from MS units" (col. 19, lines 60-63). Lu teaches the use of several digital signal processors 557, 559, 561, and 563 operating in parallel to process this inbound and outbound information. This information is transferred at high speed between various modules of Lu's system using TDM bus 522 (see, e.g., col. 19, lines 30-34).

In the section of Lu cited by the Examiner (col. 20, lines 50-62, and col. 21, lines 44-60), a real-time processor (RTP) 554 controls the processing of the digital signal processors (DSPs) 557, 559, 561, and 563 (see Fig. 9). Lu here states that "DSP section 552 includes, for example, four digital signal processor (DSP) 557, 559, 561, and 563 to process 8 TDM time slots per radio channel of traffic" (col. 20, lines 50-53). Lu also states that "Real Time Processor (RTP) 554

provisions and controls DSPs 557, 559, 561, 563 in order to schedule information processing" (col. 21, lines 44-46).

Applicant's independent claim 1 recites "at least one real-time interface processor (RTIP), and at least one application processor, wherein the at least one RTIP performs real-time operations and the at least one application processor performs high level processing functions". A person of skill in the art would understand Lu as teaching the use of parallel DSPs processing real-time radio communications to and from mobile station units under control of a real-time processor 554.

This situation is analogous to that previously argued by the Examiner for a prior secondary reference by Kajiwara (U.S. Patent No. 5,369,584). The Examiner withdrew the Kajiwara reference in response to Applicant's argument that "Kajiwara actually teaches away from the invention of claim 1 because Kajiwara teaches that both processors operate upon real-time processes" (see Applicant's Amendment dated September 6, 2005). Lu, when viewed in its overall context, also teaches a real-time processor controlling the operation of other processors operating on real-time data.

From a review of the Lu reference, a person of skill in the art would, in the most favorable view, only be motivated to incorporate real-time parallel DSP processing into the primary Jones reference. As the Examiner previously agreed by the withdrawal of the Kajiwara grounds of rejection, the Examiner likewise should withdraw the current Lu grounds of rejection as again not suggesting the use of the application processor as recited by Applicant.

Applicant's independent claim 76 recites "at least one first processing means for performing real-time processing operations and at least one second processing means for performing high level processing operations" and is believed allowable for similar reasons as claim 1.

Applicant's new independent claim 77 recites that "the at least one RTIP is coupled between the at least one interface port and the at least one application processor" and is believed allowable for at least this reason. Applicant's new independent claim 85 also recites this element

and is believed allowable for this reason as well as for similar reasons discussed above for Applicant's claim 1.

Applicant's other claims 2-9, 12-15, 17, 22-67, 69-74, and 78-84 depend, directly or indirectly, from independent claims 1 and 77 and are believed allowable for at least the reasons discussed above.

In view of the above, Applicant respectfully requests the reconsideration of this application and the allowance of all pending claims. It is respectfully submitted that the Examiner's rejections have been successfully traversed and that the application is now in order for allowance. Applicant believes that the Examiner's other arguments not discussed above are moot in light of the above arguments, but reserves the later right to address these arguments. Accordingly, reconsideration of the application and allowance thereof is courteously solicited.

Respectfully submitted,

Date: October 25, 2006

Bruce T. Neel
Reg. No. 37,406

Customer Number 33717
GREENBERG TRAURIG, LLP
2450 Colorado Avenue, Suite 400E
Santa Monica, CA 90404
Phone: (602) 445-8339
Fax: (602) 445-8100
E-mail: neelb@gtlaw.com